

EXHIBIT “B”

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DR. JASMINE YOUNGE,

Plaintiff,

v.

FULTON JUDICIAL CIRCUIT
DISTRICT ATTORNEY'S OFFICE,
GEORGIA,

Defendants.

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CIVIL ACTION NO.

1:20-cv-00684-WMR-CMS

DECLARATION OF LYDIA TOOMER-POPOOLA

1.

I am Lydia Toomer Popoola and am competent to make this Declaration. I am making this Declaration for use as evidence and specifically in support of Defendant's Motion for Summary Judgment. I have personal knowledge of all facts set forth in this Declaration.

2.

At the time that Jasmine Younger was employed at the District Attorney's Office, May 2019 through early July 2019, I was the Director of the Community

Court and the acting head of Community Prosecution for Fulton County and the District Attorney's Office for the Fulton Judicial Circuit.

3.

During May and June 2019, I had several negative encounters with Jasmine Younge in which she was rude, disrespectful, and unprofessional to myself, staff, and District Attorney Paul Howard. I reported these complaints and encounters to Lynne Nelson, Mr. Howard's Chief of Staff, during a meeting in her office in late June 2019.

4.

In mid-June 2019, Mr Howard led a meeting with local clergy and a guest pastor from New York, related to "Project Level Up," a youth gang prevention initiative. The success of Project Level Up hinged on the success of this meeting. The guest pastor from was there to educate attendees about a similar initiative he developed in New York. In front of all the guests, Jasmine Younge snatched a stack of paper out of my hands and chastised me. The guests appeared shocked and disturbed by the incident.

5.

In May or early June of 2019, a meeting for “Project Level Up” was held that included several staff members, Jasmine Younge, Paul Howard, and I. During the meeting, Ms. Younge berated Mr. Howard in front of everyone in the room. Ms. Younge demanded that Mr. Howard explain to her why he did not answer questions she asked in the meeting but answered other staff members’ questions. For the remainder of the meeting, she continued to be disrespectful to Mr. Howard and staff members. I have never seen any employee treat their boss in such a rude, disrespectful, and unprofessional way. I have never witnessed anyone speak to the District Attorney in such an insolent, impudent, and insubordinate way. The occurrence of such insubordination in the presence of so many staff members emphasized the disturbing nature of her display. I found Ms. Younge’s behavior appalling and inappropriate.

6.

On another occasion during Ms. Younge’s employment, I was present at a meeting with former Hawks NBA player Kevin Willis, Robert Willis, Dr. Pamela Roshell, Jasmine Younge, and Paul Howard. One goal of the meeting was to solidify an agreement to use property they owned North of Atlanta to help at-risk youth by removing them from environments that exposed them to gangs and crime. Mr. Howard distributed a document to the guests. Ms. Younge then collected the

document Mr. Howard distributed and distributed her own version of the same document. Ms. Younge told the attendees that Mr. Howard's document was wrong and that hers was the correct version. Mr. Howard examined the document that Ms. Younge handed out instead and had to insist that his version of the document be redistributed to the attendees. Ms. Younge insisted and said to the entire group that the District Attorney's document was wrong. Guests appeared uncomfortable and embarrassed by the interaction. I believe Ms. Younge's behavior was harmful and put the success of the gang prevention program at risk.

7.

On at least one occasion, I witnessed Ms. Younge making derogatory and demeaning comments to other staff members about Paul Howard.

8.

During my time working at the District Attorney's Office, I became pregnant. The District Attorney's Office and Paul Howard were nothing but supportive of me and my family. The District Attorney's Office and Paul Howard, both treated me in a professional manner before and after my pregnancy became known.

9.


I drafted the memorandum attached to my Declaration and sent it by email to Lynne Nelson in mid-August 2019. Ms. Nelson asked that I write down the complaints and incidents about Jasmine Younge that I had verbally communicated to her in late June 2019.

10.

As the Director of the Community Court, I can attest that the memorandum attached to my Declaration is a true and accurate copy, that a memorandum of this type is routinely made and kept in the usual course of business, that it was made at or near the time of the event it records, and that I had knowledge of the events described within and that I reported such knowledge in the regular course of business. The exhibit is as follows: (A) a memorandum dated August 12, 2019, that was drafted by me and sent to Lynne Nelson (née Moore); the memorandum is titled, 'RE: Dr. Jasmine Younge.'

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Feb 19, 2022.


Lydia Toomer Popoola (Feb 19, 2022 08:22 EST)

Lydia Toomer Popoola

EXHIBIT “B-1”

MEMORANDUM

TO: Lynne Nelson Moore
FROM: Lydia Toomer-Popoola
DATE: Monday, August 12, 2019
RE: Dr. Jasmine Younge

The following describes my personal encounters with Policy Advisor, to District Attorney Paul L. Howard, Jr., Dr. Jasmine Younge:

1. During a meeting for Project Level Up with local clergy and a guest pastor from New York, Dr. Younge snatched a stack of paper out of my hand in view of the entire room. She stated the information was not approved and I did not have the authority to disseminate the flyer.
2. Following the meeting, I was directed to bring our guest from New York to meet with the investigator tasked with transporting him to the airport to confirm if there was enough time for him to eat lunch at Mary Macs. While waiting for the investigator to arrive, Dr. Younge stood over the guest who was seated on a couch and yelled to me that he was her responsibility and that I he needed to come immediately with her because she was my boss.
3. During a meeting discussing Project Level Up, Dr. Younge berated her boss publicly and demanded that he explain why he would answer questions that I asked but not respond to hers. She then continued to conduct herself in a disrespectful and embarrassing manner throughout the remainder of the meeting to the point where all attendees were uncomfortable.
4. During a meeting with Kevin Wills, Robert Willis, Dr. Pamela Roshell and DA Howard, Mr. Howard distributed a document. Dr. Younge then proceeded to look at the document and disseminate her own version of the same document. She remarked that her version of the document was the correct one and the DA's was not. Mr. Howard then directed her to redistribute the document he originally handed out to which she remarked audibly that it is wrong.